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April 16, 2015

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RE: Your Motion to Intervene in *In re New England Compounding Pharmacy, Inc. Products Liability Litigation*, MDL 2419 (D. Mass.)

Dear Proposed Intervenors:

I write on behalf of the Plaintiffs' Steering Committee in the multidistrict litigation styled *In re New England Compounding Pharmacy, Inc. Products Liability Litigation*, MDL No. 2419, currently pending in the U.S. District Court for the District of Massachusetts. I am the Court-appointed *Pro Se* Liaison in this matter, and in that capacity it is my responsibility to provide information and assistance to unrepresented individuals in this litigation. That said, I do not represent you, and nothing in this letter or any of our subsequent communications shall be construed as an offer or act of representation of you by me.

I write concerning your Motion to Intervene with Newly Discovered Evidence filed with the Court on February 11, 2015. In that motion, you sought to intervene as plaintiffs because you "have Documents, exhibits, Financial records related to this Litigation," and

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because "From 2002 - through 2013 Intervenors had Business Dealings with New England Compounding Pharmacy, Inc. and are Financially obligated to this case."

The Plaintiffs' Steering Committee, as the Court-appointed leadership for the Plaintiffs in this MDL, would be interested to learn more from you about the documents and information you wrote that you have concerning this litigation, and would like to discuss with you how we could potentially work together to further the Plaintiffs' cause in this matter. You can reach me at the mailing address listed above, or via email at akmartin@lchb.com, or via telephone at (212) 355-9500 or (888) 321-1510. I look forward to your response.

Very truly yours,

Annika K. Martin

cc: *via e-mail* Plaintiffs' Steering Committee

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